

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

Oral Argument Requested

**NOTICE OF THE TPP TRIAL DEFENDANTS'
JOINT MOTION TO COMPEL PRODUCTION OF DOCUMENTS AND
DATA RELEVANT TO PLAINTIFF'S ALLEGED DAMAGES
AND TO SET DEADLINES FOR DAMAGES EXPERTS**

PLEASE TAKE NOTICE that on November 21, 2022, or as soon as counsel may be heard, counsel for Defendants Zhejiang Huahai Pharmaceutical Co., Ltd., Huahai US Inc., Princeton Pharmaceutical Inc. d/b/a Solco Healthcare LLC, Solco Healthcare US, LLC, Teva Pharmaceuticals USA, Inc., Actavis Pharma, Inc., Actavis, LLC, and Torrent Pharma Inc. (collectively, the "TPP Defendants") shall move for entry of an Order compelling the production of documents and data relevant to Plaintiff's alleged damages, pursuant to Rule 37 of the Federal Rules of Civil Procedure, and for an Order to set deadlines for damages experts.

PLEASE TAKE FURTHER NOTICE that in support of their motion, the TPP Defendants shall rely upon the Memorandum of Law in Support submitted

herewith, the Certification of Gregory E. Ostfeld, Esq., together with the attached exhibits, and any submissions made hereafter in further support of their motion; and

PLEASE TAKE FURTHER NOTICE that a proposed Order is submitted herewith; and

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

Dated: October 20, 2022

By: /s/ Gregory E. Ostfeld

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 20, 2022, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all CM/ECF participants in this matter.

/s/ Gregory E. Ostfeld
Gregory E. Ostfeld